

# **La Rue Declaration**

## **Ex. A**

ORIGINAL

JS

1 UNITED STATES DISTRICT COURT  
2 SOUTHERN DISTRICT OF NEW YORK

3 -----X  
4 TOM OGNIBENE, et al.,

5 PLAINTIFFS,

6 -against-

Case No:  
08 CV 01335 (LTS) (TDK)

7 SCHWARZ, et al.,

8 DEFENDANTS.

9 -----X

10 DATE: June 17, 2008

11 TIME: 9:22 A.M.

12  
13  
14 EXAMINATION BEFORE TRIAL of the Plaintiff,

15 ROBERT PEREZ, taken by the Defendant(s), pursuant to  
16 Stipulation and to the Federal Rules of Civil Procedure,  
17 held at the offices of Michael A. Cardozo, Esq., New York  
18 City Law Department, 100 Church Street, New York, New York  
19 10007, before Cleo Shenkin, a Notary Public of the State of  
20 New York.  
21  
22  
23  
24  
25

PEREZ

1 MR. LA RUE: Off the record.

2 (Whereupon, an off-the-record discussion was  
3 held.)

4 A. In order to get jobs, I hope you understand me --  
5 and I go against my lawyer and the two lawyers I got  
6 here -- you have to have a connection, I no got  
7 connections.

8 Q. And do you think you can get a connection by  
9 making --

10 A. No.

11 Q. -- political contributions?

12 A. I no want it.

13 Q. So, I will go back to my other question, do you  
14 plan to seek City work other than by sealed competitive  
15 bid?

16 A. If they call me, I be glad to provide my service  
17 to the City of New York.

18 Q. Okay.

19 Have you ever started litigation that challenged  
20 the denial of a bid?

21 A. Yeah, I think it was when the -- not they denied  
22 to Diamond Asphalt, uh, it was when the City tried to do  
23 the joint bidding with the utilities, and Con Edison,  
24 telephone, Brooklyn Union, et cetera.

25 And we won the case in the Supreme Court, in

PEREZ

1 Q. Do you have any other lobbyists besides  
2 Mr. Davidoff's firm?

3 A. No.

4 MR. LEVINE: Okay, I have no further  
5 questions.

6 MR. LA RUE: Okay.

7 MR. LEVINE: Subject to the resolution of  
8 the issue with Mr. Pines.

9 (Whereupon, at 10:37 A.M., the Examination  
10 of this Witness was concluded.)

11

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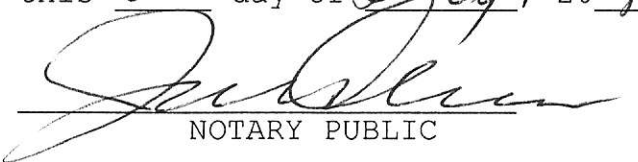
  
ROBERT PEREZ

15 Subscribed and sworn to before me

16 this 22 day of July, 2008.

17

18

  
NOTARY PUBLIC

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**J. ROBERT ALESSI**  
Notary Public, State of New York  
No. 01AL5077401  
Qualified in Nassau County  
Commission Expires 5-5-2011

# **La Rue Declaration**

## **Ex. B**

**OFFICIAL TEXT**

**Charter Revision Commission's Proposal on Campaign Finance Reform**

At press time, the official language to be placed on the ballot (in the event this proposal does appear on the ballot) is as follows:

Shall the changes related to the voluntary campaign finance system, including (1) prohibiting corporate contributions, (2) requiring disclosure and regulation of contributions by those doing business with the City of New York and regulation of indirect campaign expenditures, (3) establishing a special budget process for the Campaign Finance Board, and (4) establishing a procedure for filling vacancies on the Campaign Finance Board, proposed as amendments to Chapter 46 of the City Charter, be adopted?

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# **La Rue Declaration**

## **Ex. C**





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### UNIONS MAKE A POWER PLAY Seek bigger political voice

BY JOEL SIEGEL DAILY NEWS SENIOR POLITICAL CORRESPONDENT

Sunday, April 29th 2001, 2:21AM

Musicians Local 802, whose 10,000 members play in venues from bar mitzvahs to Broadway, was never even a bit player in city elections - until now.

This year, the union has peppered candidates with questionnaires and for the first time is interviewing City Council hopefuls to make endorsements.

"We've had 70 in so far, one every 15 minutes," boasted Heather Beaudoin, the local's political director. "We want our local to have some muscle."

With term limits remaking City Hall, labor unions are mobilizing to play an unprecedented role in this fall's municipal elections, seeking to maintain and even increase their influence over city government for years to come.

By one estimate, twice as many unions are working to elect candidates this year than in any other municipal election. And their help is more extensive and coordinated than ever before, with unions offering such assistance as election lawyers, printing, specialized voter lists and even campaign strategy on top of the manpower and money typically bestowed on anointed candidates.

"What we're doing, it's unparalleled," said Brian McLaughlin, president of the Central Labor Council, an umbrella group representing 1.3 million workers.

The unions are putting extra weight behind candidates for six open City Council seats who are themselves union officials or members, labor leaders said.

The goal is to create a core of new Council members fiercely loyal to the labor movement, giving the unions a voice in naming a new Council speaker and a hand in choosing new committee chairmen, labor leaders said.

"Essentially, they would be a 'sixth borough' who would work with us," said Ed Ott, the Central Labor Council's chief of public policy.

The breadth of union involvement is beginning to sound alarms in the business community, which fears the playing field is tilting too much toward labor. "From our perspective, this could be a disaster," said a business lobbyist who asked not to be identified.

Labor's increased activism is undisputed.

Four years ago, the 15,000-member Mason Tenders District Council, which represents laborers and Catholic school teachers, did nothing in the municipal elections beyond backing Councilman Sal Albanese for mayor.

"And it was just a paper endorsement," said Michael McGuire, the political director.

This year, the union plans to take sides in the races for mayor, controller, 20 City Council seats and four borough presidents, then place 500 to 750 volunteers at the disposal of its candidates. It opened a political action committee and will give up to \$50,000 in donations, McGuire said.

United Food and Commercial Workers Local 1500, which represents 10,000 supermarket workers, played no role in local elections until this year. It hired a political director, Anthony Speelman, and hopes to provide 400 volunteers and \$30,000 in contributions.

"The key right now is to elect people who are friendly to union positions," Speelman said. One of its big issues: stopping nonunion megastores like Costco from opening.

Even the 125,000-member District Council 37, one of the biggest political players in town, will do more. The municipal union put 1,300 volunteers on the streets for Hillary Rodham Clinton's 2000 Senate bid; it hopes to double that for this year's races.

"We have an opportunity to, essentially, elect our employer - the mayor, the City Council, the Council speaker. We are going to take complete advantage of that," said DC37 chief Lee Saunders.

Lacking a consensus in the hard-to-handicap mayoral race, many of the unions are focusing on the City Council for now. Under one scenario, many will steer clear of the mayoral contest until the expected Democratic primary runoff, when their ability to affect the outcome will be greater.

A driving force behind the unions' mobilization is term limits, which assures the election of a new mayor, 35 Council members and a Council speaker in 2001. "It would be malpractice for the unions to let this opportunity go by," said Evan Stavisky, a Central Labor Council consultant.

Another factor is a 1998 change in the city's campaign finance law that further capped top contributions and mandated that the city give \$4, instead of \$2, for every \$1 raised. That dampened the influence of developers and other big-money interests - and boosted the relative clout of labor, whose power has always been in providing

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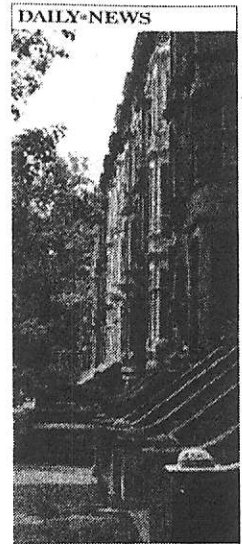
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